

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SCANSOFT, INC.)
Plaintiff,)
v.) Civil Action No. 04-10353 PBS
VOICE SIGNAL TECHNOLOGIES, INC.,)
LAURENCE S. GILLICK, ROBERT S.)
ROTH, JONATHAN P. YAMRON, and)
MANFRED G. GRABHERR)
Defendants.)

SCANSOFT, INC.'S ASSENTED TO MOTION FOR IMPOUNDMENT

ScanSoft, Inc. (“ScanSoft”) moves, pursuant to Local Rule 7.2 and paragraph 14 of the parties’ agreed upon Protective Order for an order impounding Plaintiff’s Response to Defendants’ “Supplemental” Objections to Court Order Compelling VST to Produce Its Source Code (“Supplemental Response”), filed concurrently by hand.

As grounds for this motion, ScanSoft states that the Supplemental Response discloses portions of the transcript of the February 22, 2005 deposition of Daniel Roth, designated by VST as “Highly Confidential.” The Supplemental Response also discloses highly sensitive and proprietary ScanSoft trade secret information contained in ScanSoft’s Answers to the Second Set of Interrogatories (Nos. 1-4) of VST, designated by ScanSoft as “Highly Confidential.”

Pursuant to paragraph 14 of the parties' Protective Order, which was filed with the Court on June 18, 2004, but has not yet been entered, any documents filed with the Court that disclose materials designated as "Highly Confidential" must be filed under seal.

WHEREFORE, ScanSoft requests that the Court enter an order impounding ScanSoft's Supplemental Response. ScanSoft further requests that the Court grant it leave, pursuant to Local Rule 7.2(d), to file the Supplemental Response under seal concurrently with this motion for impoundment.

Dated: March 14, 2005

SCANSOFT, INC.,
By its attorneys,

/s/ Jack C. Schecter
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CERTIFICATE PURUSANT TO LOCAL RULE 7.1

I certify that counsel for ScanSoft conferred with counsel for VST on March 14, 2005 in an effort to resolve the issues presented in this motion and that counsel for VST assented to this motion.

/s/ Jack C. Schecter

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